

**Exhibit D**

**Debtors' Email to BP, Dated January 21, 2021**

**From:** [Nathan Vaughn](#)  
**To:** [Gurses, Kamil](#); [Scott, Danielle](#)  
**Cc:** [Rex Richardson](#); [Greaser, Daniel](#); [Heath Suire](#); [Rocky Robbins](#)  
**Subject:** SOP and Secretarial Order  
**Attachments:** [DOI Secretarial Order on Leases.pdf](#)

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Kamil / Danielle:

Attached is a Secretarial Order from DOI issued yesterday which suspends current delegated authority for approval of certain activities, including specifically activities related to extensions or amendments to a lease, contract or other agreement (See Sec 3g)

Given the uncertainty raised by the Secretarial Order and the path the DOI will direct BOEM/BSEE to take in the coming weeks, there is no certainty that an SOP, regardless of applicability and timely submittal, would be approved to hold the lease and the only unambiguous path to prevent the MC 519 lease from expiring on 5 April 2021, is to ensure that production is reinstated prior to that date.

Our comments to the Letter Agreement submitted by BP yesterday will be coming soon, but in the interim and given the uncertainty created by the DOI Order on any approval of an SOP, BP must act promptly to implement the previously discussed Temporary Single Flowline Plan (and on the timeline provided to BP leadership on 15 January) to ensure production is restored prior to 5 April 2021.

As ever, Fieldwood, as stated previously, stands ready, willing and able to implement, as Operator, the Temporary Single Flowline Plan, to ensure that this timeline is met.

Regards,

Nathan

**Nathan Vaughn** | Deepwater Land Advisor



2000 W. Sam Houston Pkwy S., Suite 1200  
Houston, Texas 77042  
[nathan.vaughn@fwelc.com](mailto:nathan.vaughn@fwelc.com)  
Office: 713.969.1085  
Cell: 832.904.3581



THE SECRETARY OF THE INTERIOR  
WASHINGTON

ORDER NO. 3395

**Subject:** Temporary Suspension of Delegated Authority.

**Sec. 1. Purpose.** This Order is made for the purpose of implementing a targeted and time-limited elevation of relevant decisions at the Department of the Interior (Department) for the purposes of reviewing the questions of fact, law, and policy they raise. This Order ensures that the Department continues its existing operations—including operations necessary for health, safety, and national security matters—consistent with all legal obligations and policy goals to uphold trust and treaty responsibility to tribal nations and to responsibly steward the Nation's public lands, waters, and resources for current and future generations.

**Sec. 2. Authority.** This Order is issued under the authority of Section 2 of Reorganization Plan No. 3 of 1950 (64 Stat. 1262) and is consistent with 200 DM 1.

**Sec. 3. Suspension of Authority.** The delegations of authority to Department Bureaus and Offices to take any of the following actions are hereby temporarily suspended, but may be approved by leadership identified in Section 4 of this Order:

- a. To publish, cause to be published, or aid in the publication of any notice in the Federal Register, including, but not limited to, notices of proposed or final agency action and actions taken in accordance with the National Environmental Policy Act;
- b. To issue, revise, or amend Resource Management Plans under the authority of Section 202 of the Federal Land Policy and Management Act, as amended;
- c. To grant rights of way, easements, or any conveyances of property or interests in property, including land sales or exchanges, or any notices to proceed under previous surface use authorizations that will authorize ground-disturbing activities;
- d. To approve plans of operation, or to amend existing plans of operation under the General Mining Law of 1872;
- e. To issue any final decision with respect to R.S. 2477 claims, including recordable disclaimers of interest;
- f. To appoint, hire, or promote personnel, or approve the appointment of any personnel, assigned to a position at or above the level of GS 13, but this does not apply to seasonal hires or emergency work force personnel;

- g. To issue any onshore or offshore fossil fuel authorization, including but not limited to a lease, amendment to a lease, affirmative extension of a lease, contract, or other agreement, or permit to drill. This does not limit existing operations under valid leases. It also does not apply to authorizations necessary to: (1) avoid conditions that might pose a threat to human health, welfare, or safety; or (2) to avoid adverse impacts to public land or mineral resources.

Sec. 4. **Implementation.** Any and all delegations of authority to take the actions set out in Section 3 are temporarily suspended with respect to individuals other than a confirmed or Acting official in the following positions or a non-career official who has been delegated the authority to exercise the authority associated with the following positions under current law and regulations:

- a. Secretary
- b. Deputy Secretary
- c. Solicitor
- d. Assistant Secretary – Policy, Management and Budget
- e. Assistant Secretary – Land and Minerals Management
- f. Assistant Secretary – Water and Science
- g. Assistant Secretary for Fish and Wildlife and Parks
- h. Assistant Secretary – Indian Affairs
- i. Assistant Secretary – Insular and International Affairs

Sec. 5. **Expiration Date.** This Order is effective immediately and will remain in effect for 60 days, or until any of its provisions are amended, superseded, or revoked.



Scott de la Vega  
Acting Secretary of the Interior

**Date: JAN 20 2021**